

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
BMG RIGHTS MANAGEMENT (US) LLC, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	No. 1:14cv1611 (LO / JFA)
	)	
COX ENTERPRISES, INC. <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**DEFENDANTS' MOTION TO COMPEL AGAINST NON-PARTY RIGHTSCORP, INC.**

PURSUANT TO Rules 26, 37, and 45, of the Federal Rules of Civil Procedure, Defendants move the Court to enter an order to compel against non-party Rightscorp, Inc. to produce documents and source code.<sup>1</sup> The grounds and reasons for granting this relief are stated with particularity in the accompanying memorandum of law. A proposed order is submitted herewith.

**Local Rule 37(E) Meet and Confer Statement**

Counsel for Defendants submitted a detailed letter on June 15, 2015, describing the discovery now sought, and then held an extended telephonic meet and confer with Rightscorp, Inc.' counsel on June 18, 2015 concerning these matters. Despite their efforts, the parties were unable to resolve their disputes.

---

<sup>1</sup> Rightscorp, Inc. has stipulated to the jurisdiction of this Court to adjudicate discovery motions concerning subpoenas served on it in this action.

Dated: June 19, 2015

/s/ Craig C. Reilly  
Craig C. Reilly, Esq. (VSB # 20942)  
111 Oronoco Street  
Alexandria, Virginia 22314  
TEL (703) 549-5354  
FAX (703) 549-5355  
[craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendants*

*Of Counsel for Defendants:*

Andrew P. Bridges (*pro hac vice*)  
FENWICK & WEST LLP  
555 California Street  
San Francisco, California 94104  
TEL (415) 875-2389  
FAX (415) 281-1350  
[abridges@fenwick.com](mailto:abridges@fenwick.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2014, the foregoing was filed and served electronically by the Court's CM/ECF system upon all registered users<sup>2</sup>:

/s/ Craig C. Reilly  
Craig C. Reilly, Esq. (VSB # 20942)  
111 Oronoco Street  
Alexandria, Virginia 22314  
TEL (703) 549-5354  
FAX (703) 549-5355  
[craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendants*

---

<sup>2</sup> Counsel for Plaintiffs also represent Rightscorp, Inc., and receive service by ECF.